

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities)
ex rel. Melanie Hall, Administrator,)
)
Plaintiff,)
v.)
)
Premier Global Corporation, a Kansas corporation,)
formerly known as Premier Construction Services,)
Inc., and doing business as Premier Construction)
Billing;)
Premier Factoring, LLC, a Kansas limited)
liability company;)
PF-2, LLC, a Kansas limited liability company;)
PF-3, LLC, a Kansas limited liability company;)
PF-4, LLC, a Kansas limited liability company;)
PF-5, LLC, a Kansas limited liability company;)
PF-6, LLC, a Kansas limited liability company;)
PF-7, LLC, a Kansas limited liability company;)
DDI Advisory Group, LLC, a Kansas limited)
liability company;)
Steve Jonathan Parish, an individual;)
Richard Dale Dean, an individual;)
Premier Marketing Management,)
a Kansas corporation;)
Joshua Dane Owen, an individual;)
J&H Holdings, LLC, a cancelled Oklahoma)
limited liability company;)
Kyle Blackburn, an individual;)
Mitzimack, Inc., an Oklahoma corporation;)
Erika Greggs, an individual;)
Elkins & Associates Inc., an Oklahoma corporation;))
Clyde Edward Elkins, an individual;)
James Scott Stanley, an individual;)
Brent Lee Worley, an individual;)
Byron Kent Freeman, an individual;)
Karen Lynne Freeman, an individual; and)
Jay Michael Bogdahn, an individual,)
)
Defendants.)

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

OCT 18 2022

RICK WARREN
COURT CLERK

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Case No. CJ-2022-5066

**EMERGENCY MOTION FOR PARTIAL LIFT OF ASSET FREEZE AND
TO ALLOW CLOSING OF SALE OF CERTAIN REAL PROPERTY**

The Oklahoma Department of Securities *ex rel.* Melanie Hall, Administrator (“Plaintiff”), respectfully moves this Court for an order allowing the closing of certain real property owned by Defendant Premier Global Corporation and partially lifting the asset freeze entered on October 14, 2022.

On October 13, 2022, Plaintiff filed a *Petition for Permanent Injunction and Other Relief* (“Petition”) pursuant to the Oklahoma Uniform Securities Act of 2004 (“Act”), Okla. Stat. tit. 71, §§ 1-101 through 1-701 (2022), against numerous Defendants including Premier Global Corporation; Premier Factoring, LLC; PF-2, LLC; PF-3, LLC; PF-4, LLC; PF-5, LLC; PF-6, LLC; PF-7, LLC; DDI Advisory Group, LLC; Steve Jonathan Parish; Richard Dale Dean; Premier Marketing Management; and Joshua Dane Owen (the “Premier Defendants”).

On October 14, 2022, this Court issued an *Order Freezing Assets, Order Prohibiting Disposition of Assets and Order Prohibiting Destruction or Disposition of Records* (“Order Freezing Assets”) against the Premier Defendants. Plaintiff had petitioned this Court for the Order Freezing Assets to protect the rights of Plaintiff in its obligation to protect the public interest; to prevent any dissipation of the Premier Defendants’ assets, including investor funds; and to remedy actions that Defendants have already committed.

On October 14, 2022, Plaintiff learned that Defendants Premier Global Corporation and Steve Jonathan Parish were finalizing the sale of real property owned by Premier Global Corporation located at 4575 Dean Martin Drive #1503, Las Vegas, Nevada 89103 (“Las Vegas Property”). The sale was to close at Lawyers Title of Nevada, Inc. in Henderson, Nevada. The Order Freezing Assets prohibits the sale of the Las Vegas Property. Plaintiff asserts that proceeding with the sale is in the best interest of Plaintiff and the investors but that the proceeds of the sale should be preserved until this Court decides how disposition should be made.

Plaintiff moves for an order partially lifting the Order Freezing Assets to solely allow Bank of America to accept deposits to the Bank of America account ending in ##### 7271 ("Premier Account").

Plaintiff also moves for an order partially lifting the Order Freezing Assets to allow Lawyers Title of Nevada, Inc. to proceed with the closing of the sale of the Las Vegas Property and to deposit the net proceeds of the sale of the Las Vegas Property into the Premier Account.

Plaintiff also requests an order that the proceeds of any other Assets of the Premier Defendants, as defined in the *Application for Order Freezing Assets*, be sent directly to Bank of America for deposit to the Premier Account.

Respectfully submitted,



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CERTIFICATE OF MAILING

The undersigned certifies that on the 14th day of October, 2022, a true and correct copy of the foregoing was mailed by first class mail, with postage prepaid thereon, to the following:

Premier Global Corporation
Steve Parish, Registered Agent
620 South Mulberry Road
Derby, KS 67037

Premier Factoring, LLC; PF-2, LLC; PF-3, LLC; PF-4, LLC; PF-5, LLC; PF-6, LLC
Jeffrey Frazee, Registered Agent
330 East Madison Ave., Suite 201
Derby, KS 67037

PF-7, LLC
Jeffrey Frazee, Registered Agent
620 South Mulberry Road
Derby, KS 67037

DDI Advisory Group, LLC
Dawn Byers, Registered Agent
3867 North Lily Circle
Maize, KS 67101

Steve Jonathan Parish
1016 Summerchase Cir.
Derby, KS 67037

Richard Dale Dean
4518 Wyvonnies Way
Plano, TX 75024

Premier Marketing Management and Joshua Dane Owen
c/o Trinidad Galdean
5025 E. Kellogg Drive, Ste. 110
Wichita, KS 67218

Patricia C. Taber